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JUN 25 1984

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April, 1984

Analysis of Submissions Phase 2, Stage 2C Final Site(s) Evaluation

Environmental Assessment of the Landfill Component of Halton's Solid Waste Management System

URBAN DOCUMENTATION CENTRE
RESEARCH UNIT FOR URBAN STUDIES
McMASTER UNIVERSITY
HAMILTON, ONTARIO

SUBMISSIONS REPORT
DRAFT STAGE 2C WORK PROGRAM
HALTON ENVIRONMENTAL ASSESSMENT

This report includes the submissions to the Draft Stage 2C Work Program, circulated to public agencies, interest groups and the general public on March 6, 1984. Comments were requested by March 23, 1984.

The following submissions were received:

1. The Corporation of the Town of Oakville
2. Mr. Hans Kreplin
3. The Regional Municipality of Halton
4. The Proctor and Redfern Group
5. The Ministry of the Environment
6. Mr. David Estrin on behalf of the Tremaine Britannia Citizens Group
7. Niagara Escarpment Commission.*

It should be noted that the City of Burlington CAO Report 14/84 was dealt with in the Draft Stage 2B Report and that the following comment was included on Stage 2C:

> "Phase 2, Stage 2C Work Program
>
> At this late stage in the EA Study process we do not see any point in commenting on the Work Program leading to the selection of the preferred site(s). Given the steps the consultant has already taken, the next steps set out in the Work Program must follow, if he is not to jeopardize the integrity of his process."

*With respect to the Niagara Escarpment Commission letter, it has been dealt with in the Stage 2B submission Report due to the integrated references between the draft Stage 2B Report and draft Stage 2C Work Program.

The submissions and study team responses are shown below.

URBAN DOCUMENTATION CENTRE
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McMASTER UNIVERSITY
HAMILTON, ONTARIO

006021

RESPONDENT NO. 1: THE CORPORATION OF THE TOWN OF OAKVILLE

Date of Submission: March 23, 1984
Date Received: March 30, 1984

COMMENT:

We suggest that the public participation process be directly linked into the data gathering and analysis process; unfortunately it is not clear from the present structure of the work program how this can be achieved.

STUDY TEAM RESPONSE:

The Final Stage 2C Work Program will address the relationship between the social impact assessment (SIA) and the public participation program. In fact, the two are closely inter-related. Changes to the flow diagram for Figure One will be included in the Final Work Program to show graphically the close relationship of the SIA and the public consultation process in Stage 2C.

COMMENT:

1. **The timing of this process is not clear from the document. It is suggested that the work program identify start and finish times together with intervening dates or events where dialogue can take place and where a feedback and monitoring system can be built into this total package. I realize that on Figure I an attempt is made to do this but it appears that this is only going to be available for the social impact assessment stage and not for the whole of the work program.**

STUDY TEAM RESPONSE:

The Final Work Program will contain estimated dates for the social impact assessment. It will take into account the activities of the study team with respect to their direct involvement in the program via attendance at workshops

and also in terms of input required from them to complete the social impact assessment. In effect, the social impact assessment process and the workshops will be the mechanism for public dialogue and feedback on the total work program for Stage 2C.

COMMENT:

2. This time table should also be sufficiently detailed to establish a location for these discussions. The residents in the Trafalgar/Burnhamthorpe Roads area are making inquiries with respect to the use of the Welding Institute of Canada's building on Burnhamthorpe Road and perhaps you could contact Mr. Johnston to see if he could be made available on a regular basis. It certainly is suitable for the types of discussions that I think will take place.

STUDY TEAM RESPONSE:

The site meetings which were held in Oakville on May 14, 15 and 17, were held at the Welding Institute Building.

COMMENT:

3. It is also important to identify individuals from the consultant's team who will be present at these workshops and discussions and what role they will play and what role is expected of the workshop participants.

STUDY TEAM RESPONSE:

The initial set of workshops are designed to elicit issues and concerns. Consequently, the presence of Consultants from the study team will include Myra Schiff (Workshop Co-ordinator); Walker, Wright, Young Associates Limited and Hydrology Consultants.

In addition to the workshops, extra meetings were requested by the site owners on Candidate Site A, B, and C to discuss their concerns about the three sites.

A proposed format for the workshops would be:

3.1 Brief presentation (10 minutes), reviewing the social impact assessment process in Stage 2C and the agenda for the workshop session.

3.2 In order to gain a better understanding of what the residents feel are the salient features of their community, the group would be asked to draw a map of their neighbourhood on a large base map that we will supply. They can annotate the map to show historical buildings, creeks, farm locations or whatever else is important to them.

3.3 We would then break into groups, each of which would use flip charts to generate a list of factors they think should be included in the evaluation. These would likely be more detailed elaborations of some of our factors or sub-factors (e.g., number of people who would lose part or all of their livelihood, which falls under the general "Costs" factor but has never been specifically mentioned before).

3.4 Following that, we would ask people to "provide us with information they think we should know about their area in making our evaluation". To a large extent this may relate very closely to item 3 above, in that it would supply examples of the factors they list. Hence, we are considering the possibility of combining these two to leave time for the exercise described below.

3.5 As an exercise, the groups would be asked to reach a consensus on issues. Thus, they might be asked to decide whether they would prefer saving farm land or having longer haulage routes, shorter haulage routes or saving the view from the Escarpment, etc.

3.6 Finally, the groups would re-convene to present a brief report and ask questions.

There will be a printed agenda, with times specified, to be distributed to each person at the workshop.

The consultants' roles at the workshops are to be facilitator, recorder, and listener. They should not affect the proceedings nor is this the place for an extensive question and answer period, though some of that is necessary and inevitable.

COMMENT:

4. **It is also important I believe to ensure that the meeting dates in Oakville are different from the meeting dates in Burlington and Milton in order that there is the opportunity for attendance at these meeting by representatives of the other areas. This can only be beneficial as the process comes to a conclusion in that there will be at least an awareness of the views of others in the Region on this process and potential solutions.**

STUDY TEAM RESPONSE:

The meetings will be held on different nights in different communities, but there will be no provision made for groups from other areas to observe or participate in the workshops of a given area; neither has there been any provision for a Region-wide workshop included in the work program. Instead, a region-wide questionnaire is proposed in Stage 2C which would address a wider-based audience outside the area of the candidate sites.

COMMENT:

5. **What you are proposing is not an easy task and I would urge you to spend a great deal of care and attention in assuring that all of the above points are considered. I realize that there may be budget constraints, but I would hope that at this vital stage of this important process that**

this will not damage the ability to have a meaningful understanding of the decision that must be made. In addition, I would urge you to upgrade the quality of presentation material (particularly that of the maps) so that they may be more readily understood by individuals who are not familiar with the terms that are used or the interrelationships that the various data may have with each other and more particularly with respect to the layout of the various sites.

STUDY TEAM RESPONSE:

Your concern regarding the process is noted. We are attempting to structure the Stage 2C workshops in a manner which is conducive to receiving input from the public potentially affected in the vicinity of the candidate sites.

With respect to the quality of presentation material, we note the comments and will try to address these in the future.

COMMENT:

6. I would like to bring forward the following more detailed points:

6.1 In Section 4 which starts on Page 5 I would request that there be a statement of the data base level which is being utilized and which the field tests, I understand, will be compared to. I would also suggest that a definition of 'mitigation measures' should be placed in the work program. Similarly a definition of 'conceptual' should be used in order that the level of detail can be understood at the early stages and not discussed at the latter stages of this process.

STUDY TEAM RESPONSE:

6.1 In general, mitigation measures are those physical, financial and operational steps which will be taken to reduce the possibility of adverse impacts resulting from the operation of a potential landfill operation.

In the context of the Environmental Assessment Act, a description of "the actions necessary or that may be reasonably expected to be necessary to prevent, change, mitigate or remedy the effects upon or the effects that might reasonably be expected upon the environment" is a requirement of the Act.

The data base to be used in Stage 2C must satisfy the information requirements of the Environmental Assessment Act.

The formulation of a conceptual landfill engineering plan of operation in the environmental assessment process, would be based on the following objectives:

1) to identify natural constraints that must be overcome or ameliorated, such as drainage, management;

2) to develop a conceptual disposal plan;

3) to define environmental changes from site development and operation activities and examine methods of mitigation, such as sediment control, management of contaminated water, litter, odours;

4) to provide costs for control facilities necessary for economic analysis.

Mitigating measures incorporated into the conceptual design are intended to reduce, eliminate or ameliorate the consequences of any environmental impact.

COMMENT:

6.2 In Section 5 I would suggest that a definition of the term 'biophysical analysis' be used or alternatively that a more understandable title be introduced.

STUDY TEAM RESPONSE:

"Biophysical analysis" has now been defined in an introductory paragraph in section 5.0.

COMMENT:

6.3 In Section 6 I would suggest that the 'exchange of information and views' referred to will be enhanced by the introduction of the data developed under the other five criteria. At this level of review I find it difficult to separate the social analysis from the balance of the data. In addition in this Section when dealing with land use I would request that future land use options, in addition to present land use options, be considered.

STUDY TEAM RESPONSE:

To some extent all the impacts are social impacts, in that the key is really how they will affect the residents of the communities containing candidate sites. To that extent, it is necessary that the other impact assessments be integrated with the social impact assessment process, particularly when the issue of mitigation is addressed. The inclusion of other consultants at the workshops to discuss mitigation reflects this.

Future land use options will be addressed in Stage 2C.

COMMENT:

6.4 In Section 9 with respect to traffic generation I would ask that the long term traffic needs of the area being reviewed be taken into consideration with this analysis.

STUDY TEAM RESPONSE:

Stage 2C Work Program will review existing and future traffic volumes on the Existing Road Network affected by the haulage routes, assess traffic/travel aspects along each route and determine any road capacity deficiencies.

RESPONDENT NO. 2: HANS F. KREPLIN, P. ENG.

Date of Submission: March 25, 1984
Date Received: March 28, 1984

COMMENT:

1.0, Objective & 2.0, General Approach:

. You have misplaced the Social Impact Assessment, stating only that your objective is to draw on local opinion while your general approach drops the subject from the enumeration of subjects.

This is more than an oversight (see following comments on this item): The Social Impact is seen merely as a Public Relations exercise, and that is objectionable.

. Cultural Impact mentions only archeological and heritage concerns, ignoring present and future culture (more on this below). Previous comment on this has been ignored.

STUDY TEAM RESPONSE:

Figure 1 in the report indicates numerous other activities as part of social impact assessment (i.e., Develop S.I. Methodology, Preliminary and Revised Forecasts, Identification of Mitigation Measures). Public participation is an important element in social impact assessment, to provide information which will form part of the basis of the forecast, but it is not an end in itself.

The concept of present and future culture will be addressed when dealing with the Social Impact Assessment in terms of the characteristics of communities.

COMMENT:

3.0 Evaluation Factors:

. Lists the six categories but fails to list the priorities established at an earlier stage (and the questionnaire reopens the ranking subject). I object to either shifting or dropping this basis for assessment at this late stage.

STUDY TEAM RESPONSE:

Priorities that were established in earlier stages of the study have been maintained.

We agree that it is important at this stage to devote more attention to priorities and decision making approaches, whether these be numerical weightings or otherwise.

If the public wishes to re-evaluate the rank orders, the opportunity has been provided in the questionnaires handed out at the 2B Information Centres. There are many more people involved now, and with a clearer indication of the issues as we move to a more site specific approach.

With respect to the comment on "dropping" an evaluation factor, in fact, the questionnaires sought ideas for additional factors or sub-factors to be added.

COMMENT:

. Apply weight numbers (numerical factors) to the assessment as per priority category to make the priorities meaningful in the end result; otherwise the priorities remain only glib statements without consequence.

You say "the intent of the evaluation factors applied in Stage 2B does not change. However, the level of detail . . . would . . . be intensified . . .", and you should live up to that.

STUDY TEAM RESPONSE:

It is not our intention to apply numerical rankings to the sub-factors, nor has this been the approach thus far. We intend to deal directly with the issue of "trade-offs" among various factors in consultation with the public through the workshops. In addition, the use of mitigating measures on a site-specific basis may add further complexity to the concept of numerical rankings.

COMMENT:

4.1 Hydrological Analysis:

. The data for the NSP candidate site must include:

(a) recent reports from Dr. Cherry re leachate migration out of the Bayview site (1983);

(b) April 1981 monitoring report, Burlington landfill site, by Gartner Lee Assoc. Ltd. re leachate plume (Fig. 3 and Fig. 13).

Both are highly relevant information that cannot be ignored before recommending any preferred site(s).

STUDY TEAM RESPONSE:

Studies conducted by Dr. Cherry and Gartner Lee Associates will not be ignored in Stage 2C.

COMMENT:

. Geologic data should include gas permeability in addition to hydrogeology, and the derived consequences.

STUDY TEAM RESPONSE:

The effect of methane gas generation will be considered.

COMMENT:

4.12, Activities, & 4.1.3, Engineering/Operations

Offsite constraints (4.1.3) must be identified and considered before making a "preferred site(s)" recommendation, not afterwards as part of drafting a conceptual plan for operations. Otherwise your selection would be blind to the impacts, and impacts are largely off-site in nature.

Your "walkover" etc. must range a good deal farther than the site itself, especially into areas of lower elevation!

STUDY TEAM RESPONSE:

Off-site constraints and potential impact areas will be identified in Stage 2C.

Conceptual plans will be developed for each candidate site prior to the selection of a preferred site(s). In addition, we cannot assume that "impacts are largely off-site" until the candidate sites are investigated in detail.

COMMENT:

At P&Q#1 (Stage 2B), even the "Study Area" outlined in Map #11 is grossly inadequate as it does not include any buffer zone to the South of the site which happens to be downhill of it. It is simply cut off!

Such an approach is not only incorrect but so arbitrary as to exclude primary facts from the assessment.

STUDY TEAM RESPONSE:

The study area for P&Q1 was defined within the general context of the 1/2 mile limit except at the southern boundary. The reason for varying the extent of the study area was based on Highway 403 acting as a physical barrier on the site. We will consider the possibility of impacts on downstream users, however, in Stage 2C.

COMMENT:

The close proximity of a residential area demands an extended range of study, in this case in more than one direction. I object to the deliberate elimination of important impacts, a fact that is illustrated clearly in Map #11 of the Stage 2B report.

Again, these impacts must all be considered before, not after, the choice of a preferred site.

STUDY TEAM RESPONSE:

The 1/2 mile study area in the northern, western and eastern perimeter limits does not include residential areas. With the exception of the hydrogeological issue raised in the previous question, we believe that the communities on the south side of Highway 403 are not directly affected by a potential landfill. However, we expect that appointed representative(s) of the West Burlington Ratepayers Association will be in attendance at the workshops in Stage 2C to express their concerns; and as noted above, we will consider the possible impacts on downstream users in Stage 2C.

COMMENT:

5.1, Biophysical Analysis:

- **The human species may not enter into the "Natural Environment" factors(?), but the listed characteristics must be applied at least as much under "Social" and "Cultural" headings, or else humans must be included here.**

Your approach is highly inconsistent in this respect.

STUDY TEAM RESPONSE:

Some of the factors dealing with noise, odours, litter, etc. that were listed under the Natural Environment in the draft work program have now been shown as other factors related to the Social Impact Assessment.

COMMENT:

. **The range of "study area" or "buffer zone" requires adjusting to the subject matter: Biophysical effects are largely above ground, involving mechanisms that are totally different from the hydrological effects below ground.**

STUDY TEAM RESPONSE:

Comment noted. The appropriate distinction between effects on the biophysical versus the hydrogeological environment will be given proper consideration. Our intention in defining a study area or buffer zone in Stage 2C is to deal with the above-ground aspects primarily.

COMMENT:

6.1, Social Analysis:

. **People, and the impacts they suffer, are not considered in the biophysical analysis, but neither are they here! You specifically "will not include such considerations as noise, dust, litter, odour and concerns about water supply." [add: traffic]" These issues would be addressed . . . through workshops and/or Public Open Houses . . ."**

You cannot simply deny that these issues have social impacts. They spell out "quality of life", and the facts are:

(1) our society is greatly concerned about the quality of life;

(2) living under the spillover effects of a dump is worse, in the social context, than living "on the other side of the tracks";

(3) the central purpose of the EA process is to minimize impacts on the environment - people's environment, and on people, directly or indirectly.

Your concept of social impact clearly ignores these basic facts.

STUDY TEAM RESPONSE:

The issue of noise, dust, litter, odour, and traffic will be addressed in the workshops and at Public Information Centres. It is expected that they will be a major focus of discussions on mitigation measures, and hence will certainly not be ignored. We will also consider the experiences of comparable landfills with respect to these problems.

With respect to buffer zones, our preliminary review indicates a half-mile buffer is well within normal range.

COMMENT:

. Specifically, you propose to leave the assessment of social impacts entirely to public input. Surely, you must take the responsibility of identifying and assessing social impact factors yourself, as is done in other categories.

Public input is necessary, but not as the only source.

STUDY TEAM RESPONSE:

The social impact evaluation factors in Stage 2C will be similar to factors used in Stage 2B, with the following additions:

. the number of people who would be relocated,
. the loss of livelihood,
. the loss of enjoyment of recreational opportunities,
. the members from special population groups on the site and in the study area.

The revised work program will indicate that the comments received on the Interim Report will feed back into the social impact assessment process.

COMMENT:

. **You do not address buffer zones for social impact, nor a study area. The effects of landfill extend at least 2 km from a site. Here again, the range of investigation must suit the subject and the mechanisms involved.**

STUDY TEAM RESPONSE:

The spatial extent of adverse effects from a landfilling operation (i.e., visual, noise, dust, litter, odour, traffic) will be determined on the specific conditions of individual candidate sites. However, we feel that the 1/2 mile limit is reasonable, subject to further on-site investigation.

COMMENT:

. **The factors Noise, Dust, Litter, Odour, Water Quality, Traffic and Visibility clearly belong here, if nowhere else. Leaving it to the population to raise these issues is a cop-out.**

STUDY TEAM RESPONSE:

See response to comment on 5.1, Biophysical Analysis. The factors mentioned will be incorporated into the section on Social Impact in the Final Work Program.

COMMENT:

. **In Figure ONE, the Summary Paper is to circulate for comments, but then that goes nowhere. This heightens the concern that "Social Environment" is meant to be no more than a public relations effort and of no real consequence.**

The "very tight schedule" (p.1) adds the concern that time will run out before public input can run its course raising issues and having these assessed properly.

STUDY TEAM RESPONSE:

An interim report will be circulated on the issues and concerns raised in the initial set of workshops. This information will be used by the consulting team to prioritize impacts and collect data on the social profile of the communities involved. Opportunities have been made for input from the public in the workshops and Public Information Centres. In addition, the public will have the opportunity of reviewing the draft Environmental Assessment document once it is submitted to the Ministry of the Environment.

COMMENT:

7. Cultural Environment:

. **The archeological and heritage items are only a small element of culture and deal only with the history aspect. Present and future culture are ignored.**

STUDY TEAM RESPONSE:

The present and future culture are to be addressed through the social impact assessment in Stage 2C.

COMMENT:

. **Landfill definitely has an impact on the style of our lives, or how refined we live (emphasis on value systems, aesthetics and taste). That includes the natural environment (what is left of it), vistas, landscaping, architecture and simply freedom from nuisances.**

Typically, real estate choices depend on (1) location, (2) location and (3) location once more. This goes far beyond land values and compensation for losses. It invades people's lives more than physically: It invades their identities, now and in the future, leaving a culturally blighted area around a landfill operation: Imagine appreciating music over the roar of a bulldozer (annoying sound swell).

. **Here, too, an appropriate study area must be used.**

STUDY TEAM RESPONSE:

The issue of how people live (quality of life) will be included under social impacts. This will include use of and access to community facilities, effect on leisure and similar lifestyle issues to the extent that they can be reliably measured.

COMMENT:

. **Factors must be identified and quantified to add the aspects of present and future impacts on culture (e.g. in classifying the types or styles of properties in the area, from "prestige" to "claptrap").**

STUDY TEAM RESPONSE:

A community profile will be developed for each candidate site to document the present culture. Future plans for the area surrounding the candidate sites will be considered to determine planned changes in the Social and Cultural Environment.

COMMENT:

. **Note that this category ranks higher in priority than costs, engineering and operation of the landfill.**

STUDY TEAM RESPONSE:

Comment noted. This order of priority is addressed in the Work Program for Stage 2C.

COMMENT:

8. Costs

. **The intention to count all costs of landfill is commendable, and to convert all to a cash flow basis.**

Since the waste quantities are also to be updated, the total cost per tonne (ton?) can and should be stated as well.

STUDY TEAM RESPONSE:

We agree that the "total cost per tonne (ton?)" will be calculated.

COMMENT:

. **The possibility of a private landfill operation must be considered inherently more dangerous to public health and safety than that by a public body, requiring additional supervision and control.**

That, plus the profit margin, will make the cost of private operations greater; state the added cost, if you seriously consider that option.

STUDY TEAM RESPONSE:

Whether or not the operation of the landfill facility will be public or private will be assessed, including the question of profits.

COMMENT:

9. Engineering and Operations

. This section does not include the conceptual operating plan proposed in 4.1.3, which belongs here.

Transport questions are surely not the only issue.

STUDY TEAM RESPONSE:

We agree that the "conceptual operating plan" should be incorporated into the section on Engineering and Operations. Setbacks and height limitations will be important considerations of the conceptual plans. A revision to the Final Work Program will be made to reflect this point.

COMMENT:

. Review the site capacities under the applicable restraints:

(1) Setbacks from sensitive impact features (disregarded in Phase 2B report re P&Q#1).

(2) Height limitations set out in Appendix G of the Phase 2B report. This will severely reduce capacities of sloped sites, incl. P&Q#1 (note the relation between elevation differences and leachate pressures which were found to burst the cover envelope).

STUDY TEAM RESPONSE:

Site capacities will be addressed in more detail in Stage 2C. The theoretical basis for calculating site capacities was required at the Stage 2B level of analysis.

COMMENT:

. Consider the need for an on-site transfer station for the purposes of

(1) inspection and control of what materials are landfilled;

(2) separation of materials for EFW incineration or direct recycling.

Note that haulers may well find it more convenient not to go to an EFW plant, particularly if the load contains "contraband" material. Once it is dumped at the "working face", it is too late to control it.

If this item is included, it should also be entered under "Costs", item 8.

STUDY TEAM RESPONSE:

Transfer station(s) will be looked at in more detail in Stage 2C. It is anticipated that as part of the total system of solid waste management, the bulk of wastes will be sorted at the EFW Plant and that all landfill wastes will be by permit.

COMMENT:

C. Conclusions

The proposed Work Program, Stage 2C is full of serious flaws, as shown by the foregoing comments. It requires extensive upgrading in almost all of its categories. Otherwise it cannot be taken seriously as a fairminded assessment leading to a valid recommendation for a preferred site.

Particularly disturbing is the shallow treatment and/or the deflection to irrelevant status of the very issues of impacts on people. The human population is surely part of the environment in question, especially in heavily populated areas, but this draft appears to set out deliverately to ignore that fact.

STUDY TEAM RESPONSE:

The issues and concerns raised have been carefully noted and changes to the Final Stage 2C Work Program will be incorporated to emphasize the cultural and social impact assessment in particular.

RESPONDENT NO. 3: THE REGIONAL MUNICIPALITY OF HALTON

Date of Submission: March 29, 1984
Date Received: March 30, 1984

COMMENT:

1. **On page 3, third paragraph, the list of site specific issues is incomplete, e.g., although hydrogeological suitability appears in the first paragraph of page 3, it has been omitted from the list. I suggest you review the designation of potential haul routes in Stage 2B and clarify whether any additional work is required in Stage 2C.**

STUDY TEAM RESPONSE:

The hydrogeological suitability of the sites will be addressed in Stage 2C in more detail than previous stages. However, the candidate sites were selected based on hydrogeological suitability as one factor in the site selection process. The list on page 3 was intended to highlight distinct aspects of Stage 2C. It should be assumed that hydrogeological suitability will continue to be a significant factor in the selection of a preferred site(s). The Final Work Program will be clarified accordingly.

The Stage 2C Work Program will contain a task identified as 'Finalize Haulage Routes' whereby specific haulage routes will be determined.

COMMENT:

2. **On page 3, last paragraph, consider including a seventh category entitled "Rehabilitation and After Use" as "the ease with which a site may be rehabilitated" can provide a basis for the comparison of sites. Consider attached article on the Winnipeg experience and identify possibilities for after-use and rehabilitation schemes that may even start before land-**

fill is complete. Consult with the HRCA on natural aspects, the Regional Museum on heritage possibilities, the agricultural representatives on agricultural possibilities etc.

STUDY TEAM RESPONSE:

Rehabilitation, including concurrent use and after-use, will be considered under the Engineering and Operations category since the ease with which a site can be rehabilitated depends on the operating plan and conceptual design considerations. This point will be emphasized in the appropriate section of the Work Program.

COMMENT:

3. **On page 5, Section 4.1, the statement; "Fieldwork on the candidate sites may not be able to commence until mid-April, or late April, 1984, etc. seems unnecessary. Also on page 5, the statement "we will not attempt, during Stage 2C, to develop the level of detail required for approval of a facility on each site under the Environmental Protection Act" is unnecessary and should instead read, "in Stage 2C, a level of detail will be developed which is common to all sites."**

STUDY TEAM RESPONSE:

It is important to establish the level of detail of investigation in Stage 2C. Two of the candidate sites have been developed at the level of detail expected for an application to implement a landfill site. However, it is not our intention to go to this detailed level for the evaluation of candidate sites in Stage 2C and this distinction has been discussed with the Ministry of the Environment. Sufficient documentation will be gathered to develop an engineering feasibility analysis for the design of conceptual plans.

COMMENT:

4. **The first paragraph on page 5 should be deleted as it implies that only one new conceptual plan for a candidate landfill site is to be developed whereas we are requesting that a conceptual plan for each of the six candidate sites be developed by the end of Stage 2C, once adequate site information has been obtained. A conceptual plan for each site will allow citizens in the immediate area to gain a general understanding of the possible location and design of each site.**

STUDY TEAM RESPONSE:

The Final Work Program will incorporate the development of six conceptual plans as stated above.

COMMENT:

5. **Section 8.0, Costs, on page 15 should be retitled Section 9.0 and located last in the Work Program following "Engineering and Operations". This re-organization is recommended as costs can only be assessed at the end once road improvements, haulage distances, etc. have been evaluated.**

STUDY TEAM RESPONSE:

We would concur with re-ordering the sections as the costing analysis can only be completed once the required input information is available. The Final Work Program will be revised accordingly.

COMMENT:

6. **The section on "Engineering and Operations" should be numbered Section 8.0. Included in this new section 8.0 should be Section 4.1.3 "Engineering Plan of Landfill Operations" currently located on page 7. The second paragraph of section 4.1.3. should be revised to again reflect**

the Region's opinion that a conceptual design should be completed for each of the six candidate sites once the required information has been obtained for each site.

STUDY TEAM RESPONSE:

We agree with the above suggestion. The Final Work Program will be structured accordingly.

COMMENT:

7. **On page 11, first paragraph, clarification is needed with respect to the Waste Generator Survey as a survey of waste generating industries was conducted in Phase 2 Stage I. How extensive is this new survey to be and will it serve an additional purpose considering Stage 1?**

STUDY TEAM RESPONSE:

The purpose of the 2C survey is not to generate figures on waste production, but rather to solicit opinions from people who are not living close to the candidate sites. That is, the landfill will serve the needs of the entire Region, but the social impact analysis focusses on the surrounding residents. Given that this is a Regional facility, one ought to be able to say something about how the residents of the Region feel, and not only how residents in the immediate area of candidate sites feel.

COMMENT:

8. **On page 11, second paragraph, more elaboration is needed to explain what a social impact assessment is, i.e. it is the Regional staff's opinion that the topics of noise, dust and litter should be included in a Social Impact Assessment as they contribute to social impact.**

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HAMILTON, ONTARIO

STUDY TEAM RESPONSE:

The social impact assessment will address those issues which relate to those ways in which the landfill may affect the quality of life of the residents. By this definition noise, litter, and dust will be included as part of the social impact analysis, along with such matters as the number of people who would have to be relocated, the loss of livelihood, the loss of enjoyment of recreational opportunities, and the number of members of special population groups on the site and in the study area.

It is anticipated that noise, dust, and litter will be a major focus of the discussions on mitigating measures. Procedures for measuring these impacts in the context of the social impact assessment will be reviewed in Stage 2C.

We will also look at the experiences of comparable landfills, where possible, with respect to this problem.

COMMENT:

9. **On page 11, Section 6.1.3, the questionnaire and resulting analysis, noted in the first point, should be included as either an appendix to the Stage 2C report or within the report itself. Also, the number of public information centres to be held in the future should be detailed as should the time frame for these meetings. A series of workshops should be held very early in the Stage 2C Work Program because of public concern. Allow for an Interim Report to Council on the workshops particularly as they relate to possible mitigation measures that are suggested by citizens and that the consultant might reasonably recommend.**

STUDY TEAM RESPONSE:

The questionnaires and results will be reported in the Stage 2C report or as an appendix. With respect to the number and time of workshops, these will be documented in the final work program for 2C.

The Draft Stage 2C Work Program already indicates an Interim Report on the workshops. However, this is shown to occur after the first set of workshops, which focus primarily on issues and concerns. As well, until the initial impacts have been identified and the hydrogeologists have completed some of their work, it would be premature to discuss mitigation measures.

COMMENT:

10. On page 13, Section 7.1. Archaeological Analysis, more detail is needed on the degree of archaeological work to be done in Stage 2C, i.e. is any excavation work to take place?

STUDY TEAM RESPONSE:

The archaeological analysis in Stage 2C will not involve test pitting. The latter would require test holes to be placed at approximately 1 per 10 metres, which is not practical, given the size of the candidate sites. The research to be done involves archival reports documenting known archaeological sites, discussion with the Royal Ontario Museum, and an archaeological survey of each of the six candidate sites to map all artifacts.

COMMENT:

11. On page 15, Costs,

a) More detail on costs is required for each of the six tasks outlined on page 15. This additional detail should outline and describe the extent of work to be done for each of the tasks.

b) Review the economic analysis work program with the Region's Finance Department to confirm that no duplication will occur with the Energy from Waste Task Force economic analysis.

c) It should also be noted that the Region of Halton can undertake the waste quantities update, which is mentioned in the second point, once the results of the E.F.W. feasibility study are known.

d) More elaboration on compensation policies to be developed for owners and neighbours is needed. Explain the methods and process to be used in developing a compensation policy.

STUDY TEAM RESPONSE:

a) We will provide more detail on the six tasks outlined on page 15 of the Work Program as well as adding any additional ones required.

b) An initial meeting was held on April 5, 1984 with Messrs. Birkett, Scanlon and Wong from the Regional staff to establish liaison with the EFW task force. The work program and timing for the latter was generally discussed and mutual concerns were noted for future consideration of areas of overlap and input to the study processes during Stage 2C.

c) We would agree to working jointly with Regional staff on the Halton waste quantities forecast update and, indeed, assumed there would be considerable Regional input regarding EFW. In addition, an update of the Region's population forecasts to 2008 is required as input to the waste forecast update. We must, of course, ensure that there are no discrepancies or inconsistencies in this data. Accordingly, we have reduced the budget to incorporate assistance from Regional staff on this matter.

d) More detail on the development of compensation policy will be incorporated into the final Stage 2C work program.

COMMENT:

12. Because of the need for an EFW decision concurrent with the completion of the Stage 2C analysis, certain items identified in the Stage 2C Work Program are being undertaken "in house" for the EFW financial analysis. Specifically, we have completed most of the transportation model which is prepared to do the EFW analysis. Therefore, since the model is based on Cam Watson's basic assumptions, but is refined to include EFW costs and landfill costs, it would seem appropriate only to get Mr. Watson's "blessing" rather than to have him duplicate the work.

In addition, the Region is intending (and required by the EFW Work Program) to undertake a total solid waste system impact analysis, given various possible EFW/Landfill configurations. Therefore, before final approval of the Landfill Stage 2C Work Program is obtained, it will be necessary to sort out with the consultant which of these duties he will be undertaking.

STUDY TEAM RESPONSE:

We do not intend to duplicate the work completed by the EFW task force but time is required to understand and endorse their work to ensure defensibility and compatibility at a subsequent hearing. As noted, we have already provided some input into their analysis and have held one initial co-ordination meeting to discuss mutual interests and concerns. We would expect to provide other information as required. We anticipate working with the EFW economic model as far as possible. However, it should be noted that the timing of the two studies may not be completely coincident. It is our understanding that the EFW work will incorporate Stage 2B assumptions on landfill costing and haul costs since the Stage 2C data will not be available within the time frame for the draft report anticipated for May 14, 1984. In Stage 2C, our data will be much more site specific. For instance, we plan to revise our haul cost

assumptions based on actual users, number of trucks, etc. and on an annual basis. We would require additional runs of the EFW model once the new assumptions are available as well as some sensitivity testing. We feel that coordination with Regional staff is essential to the satisfactory completion of both studies, which are closely integrated at this stage. We intend to work with the Regional model to the extent that it is feasible.

COMMENT:

13. The comment of both the Ecological and Environmental Advisory Committee (EEAC) and the Halton Agricultural Advisory Committee (HAAC) will be forwarded following their meetings in the coming week.

STUDY TEAM RESPONSE:

No comment.

COMMENT:

14. In general the Stage 2C Work Program appears to cover all the major areas of concern for the next stage of study however, more description of the extent of the work, the timing and breakdown of who will complete each task is required by Regional staff particularly.

STUDY TEAM RESPONSE:

These items are acknowledged and will be addressed in the final Stage 2C Work Program.

COMMENT:

15. It is important that the document clearly indicate what the reports on each site will be when all of the analysis are done, and how the six will be compared, and the ranking methodology that will be used.

STUDY TEAM RESPONSE:

These points will be addressed in the final Stage 2C Work Program.

RESPONDENT NO. 4: THE PROCTOR & REDFERN GROUP

Date of Submission: March 21, 1984
Date Received: March 26, 1984

COMMENT:

1. **Page 1, Para. 1 - The stated objective is "to identify a preferred site for landfilling."**

   From our review of the information presented to date there does not appear to have been a final decision made by Regional Council rejecting the multi-site approach.

   Report No. DPD 62/84 refers to 'Final Site(s) Evaluation' in Paras. 3 and 6 of the Recommendations and in Para. 4 of the Report.

   It is therefore suggested that the first sentence be amended to read, "A major objective of this stage in the study process is to undertake a comparison of the candidate sites at a site-specific level to identify a preferred site(s) for landfilling."

STUDY TEAM RESPONSE:

We will not likely receive a final decision from Regional Council until May, 1984. Therefore, the reference to site(s) will be included in the Final Work Program, although our recommendation for a single-site approach is still valid in our opinion, and our 2C Work Program is prepared on the basis of that recommendation.

COMMENT:

2. General. - Any similar reference to "preferred site" should be changed to "preferred site(s)".

STUDY TEAM RESPONSE:

See response above.

COMMENT:

3. Page 6. - Can the Region give some indication of how it proposes to obtain "clear and free access for on-site drilling and testing work" on the candidate sites particularly within the time frame required which includes a completion date for Stage 2C of early August, 1984?

STUDY TEAM RESPONSE:

Property owners whose properties may be affected by on-site drilling and testing work will be contacted to obtain their permission to enter the properties.

COMMENT:

3. Page 6. - What will happen if the Region cannot get access to any of the candidate sites within the required time frame?

STUDY TEAM RESPONSE:

It is anticipated that we will gain sufficient access to the candidate sites.

COMMENT:

Page 7. **- The question of "Traffic Service and Safety" should be dealt with under the heading of "Public Health and Safety".**

The consultant should look at the existing traffic conditions at each of the candidate sites and the impact of the additional traffic (if any).

STUDY TEAM RESPONSE:

"Traffic Service and Safety" will be incorporated under the heading of "Public Health and Safety" similar to its designation in earlier stages. Existing traffic conditions at each site and additional future traffic will be investigated as outlined in the Stage 2C Work Program.

COMMENT:

Page 8. **- Since one of the objectives of this particular study is to undertake a comparison of the candidate sites on the basis of "Natural Environment", the unique opportunity that exists to rehabilitate an existing topographic scar between one existing and one former landfill site as opposed to establishing a new landfill site in a location where landfilling is not an established land use should be recognized.**

STUDY TEAM RESPONSE:

The value of using "an existing topographic scar" vs an undisturbed site will be considered, when the "naturalness" of the site is investigated (Section 5.1, Vegetation section). However, this can only be one of many criteria that must be considered.

COMMENT:

Page 10. - The number of residents or residences that will have to be relocated from each site should be included in the social impact assessment.

The presence of the following institutions should be recognized in the Social Analysis at Stage 2C. These institutions were not taken into account in Stage 2B.

- The Welding Institute of Canada within candidate site C2c and within one half mile of candidate sites C2d and C2e.

- The Canadian Coast Guard facilities including transformation and radio towers within candidate site C2d and within one half mile of candidate site C2e.

The social impact, other than economic impact, on residents immediately adjacent to any proposed site should be more clearly addressed in Stage 2C.

STUDY TEAM RESPONSE:

All of the above concerns will be addressed in the social impact assessment in Stage 2C.

COMMENT:

Page 12. - Land use adjacent to any proposed site should be a consideration in the evaluation of the candidate site.

STUDY TEAM RESPONSE:

Adjacent land uses (existing and proposed) will be taken into consideration in Stage 2C as they were in Stage 2B.

COMMENT:

Page 15. - The economic analysis should include a further analysis of the single vs multi-site concept. This may become even more important if a decision is made to increase the required landfill capacity due to the status of the EFW study.

- The evaluation of public vs private site operation should also include an evaluation of the multi-site approach including one public site and one private site.

- The economic analysis should reflect the following cost savings by the use of candidate Site 'F' (NSP):

  - Use of existing scales on adjacent Regional site.....$250,000

  - Use of existing access road and utilities on adjacent Regional site.....±$300,000

  - Use of existing resource recovery area on adjacent Regional site.....±$ 50,000

  - Cost saving in the resolution of the leachate spring problem at the existing Bayview site.....±$500,000

  - Costs involved in removing the waste and leachate that has spread onto Site 'F' (NSP) from the adjacent publicly-owned landfills.....±$??

STUDY TEAM RESPONSE:

Further analysis of the single vs. multi-site will be addressed as part of a revised 2C Work Program should Regional Council decide not to accept the recommendation in the draft Stage 2B report for a single site approach. In addition, any additional capacity for landfill depends on the outcome of the EFW study being undertaken by the Region.

COMMENT:

Page 16. **- In preparing the transportation analysis, it should be noted that the access to Site 'F' (NSP) should be from the North Service Road in order to take advantage of the existing access road, scales and resource recovery facilities on the adjacent existing Regional landfill site. It will also not be necessary to reconstruct King Road. The haul distances and costs should be adjusted to suit.**

STUDY TEAM RESPONSE:

Stage 2B considered only representative haulage routes with non-specific terminal points. Activity in Stage 2C will determine the point of entry into each candidate site in order to finalize haulage trip ends. During this more detailed investigation, a complete review of all aspects of site access and costs will be reviewed.

COMMENT:

The OWMC has recently announced its candidate sites for the establishment of facilities for the treatment and disposal of hazardous wastes. Three candidate sites have been identified in Halton Region including one landfill site and two sites suitable for a physical/chemical treatment plant and/or an incinerator. Two of the candidate sites selected by OWMC are in the same area as two of the candidate sites selected by Halton Region for a waste disposal site. These sites are as follows:

Halton Region	OWMC	
D4a (partial)	LF-4N	Landfill
D4g (partial)	P1-1N	Physical/Chemical or Incineration

The third site selected by OWMC (P1-13N) for a possible physical/chemical treatment plant or incinerator is relatiely close to the other Regional candidate sites C2c, C2d and C2e.

Is the Region going to review the impact of the candidate sites selected by OWMC on the site selection process still to be completed by Halton Region?

If so, what impact is this going to have on the timing of the completion of the site selection process in Halton Region?

STUDY TEAM RESPONSE:

The timing of the Environmental Assessment will continue with the selection of a preferred site by the end of July, 1984. The OWMC is not expected to select the preferred site(s) until the end of 1984.

RESPONDENT NO. 5: MINISTRY OF THE ENVIRONMENT

Date of Submission: April 12, 1984
Date Received: April 13, 1984

COMMENT:

Page 3, #1. **4.1 Hydrogeological Analysis:**

The proponent should rely on existing data such as well records if available and also field visits to assess whether the sites are acceptable. This would be sufficient for meeting the intent of the Environmental Assessment Act. After the site has been included in the final selection of candidate sites, if the consultant considers that there is a high potential for stratigraphic variation, and the existing data requires augmentation, he may decide to include data from a field investigation. This investigation, for the purpose of meeting the requirements of the EA Act, should be only to confirm the consultant's desk top assessment, and may involve a few carefully selected locations. Under certain circumstances you may wish to expand the drilling program but not beyond the level specified in Section 4.1.2 Activities for Preliminary Hydrogeologic Survey of the Draft Work Program Stage 2C. Ministry staff are prepared to support this opinion before the Environmental Assessment Board at a hearing.

STUDY TEAM RESPONSE:

The Ministry's position on the need and level of drilling required in Stage 2C are noted. It is our opinion that some drilling investigation will likely be

warranted because of the level and quality of data required to make meaningful conceptual designs and to assess their associated costs.

COMMENT:

Page 3, #2. **4.1.3 Engineering Plan of Landfill Operation:**

Your conceptual plans should be extended to include the six candidate sites. MOE does not have a specific policy in this matter.

STUDY TEAM RESPONSE:

It is now intended that conceptual plans will be prepared, for sites found to be hydrogeologically suitable for waste disposal, in Stage 2C.

COMMENT:

Page 4, #1. **5.0 Natural Environment:**

We advise that you consider the means of mitigation within the biophysical and agricultural analysis.

STUDY TEAM RESPONSE:

The means of mitigation for the biophysical and agricultural analysis will be addressed in Stage 2C.

COMMENT:

Page 4, #2. **6.1.2 Social Impact Analysis:**

We suggest that you consider mitigation measures associated with noise, dust, litter, odour and water supply.

STUDY TEAM RESPONSE:

Site-specific mitigation measures will be addressed in Stage 2C.

COMMENT:

Page 4, #2, 6.1.2 Social Impact Analysis:

Please document how haul routes, in addition to sites, have been considered in social impact analysis. You are advised to consider the effects and the means of mitigating adverse effects related to haul routes in the economic cost analysis.

STUDY TEAM RESPONSE:

The social impact assessment will include documentation of the impacts along haulage routes, in terms of noise and disruption. Mitigation measures along haulage routes, such as road improvements, will be considered in the economic cost analysis.

COMMENT:

Page 4, #3. 6.2 Land Use:

We suggest that the second general issue should include the words "and guidelines" to read, "Depending on plans of individual area municipalities, the region, and Provincial policies and guidelines;"

STUDY TEAM RESPONSE:

Comment noted. A revision will be made to the Final Stage 2C Work Program. We note also, however, that Provincial guidelines have substantially less status than Provincial policies.

COMMENT:

Page 4, #4. **8.1 Economic Analysis:**

You are advised to consider mitigation with respect to the economic environment in additon to the natural, social and cultural components of the environment.

STUDY TEAM RESPONSE:

We will be addressing the issue of compensation as a means of mitigating adverse effects to economic activities, including real estate values.

RESPONDENT NO. 6: DAVID ESTRIN, B.A. LL.B.

Date of Submission: March 26, 1984
Date Received: April 3, 1984

COMMENT:

We have previously informed you and your consultants of our position that certain fundamental errors have been made by your consultants in the Work Program to date. We have reviewed the Draft Report on Phase 2, Stage 2B (the selection of candidate sites) and are disappointed that your consultants have not incorporated our earlier concerns into their process. We see no purpose in making further comments on this draft report at this time.

Notwithstanding that we do not agree with how you got to the present stage, we offer the following comments regarding the Draft Work Program for Phase 2, Stage 2C.

It is our position that in order for your major objective of a comparison of the candidate sites at a site specific level and the identification of a preferred site for landfilling to be done thoroughly and objectively it is necessary that an equal data base for each site for each evaluation factor be used. As the Draft Work Program for Stage 2C acknowledges, certain of the candidate areas have been studied in very much more detail than others. This is particularly true of the candidate site at Tremaine Road and Britannia. The other candidate sites in comparison have very weak data bases. In the absence of a concerted and thorough effort to equalize there data bases we do not see how the candidate sites will be compared on an equivalent basis. Further, we do not see how it would be possible to do the necessary work in the contemplated time frame between April and July of this year.

We are concerned, therefore, that this imbalance in the data base will bias the comparison of candidate sites away from sites which might compare very favourably if the appropriate level of data was in fact available.

Although your consultants in this Draft Work Program take the position that for Environmental Assessment purposes it is not necessary to compare sites on a level of detail that would be necessary for a site investigation for an application under the Environmental Protection Act, we believe that this is a unique situation which makes a comparison at that level of detail necessary.

Normally, when a proponent is undertaking an environmental assessment, the level of information that is known about each candidate site is essentially equal. In those circumstances, it may be appropriate that they be compared and a preferred site identified prior to intensive investigation of on-site conditions. However, where, as in this situation, at least one of the sites has already been studied at that level of detail an objective comparison of candidate sites under the environmental assessment process makes it necessary to bring the level of detail of other cnadidate sites up to that standard.

STUDY TEAM RESPONSE:

For hydrogeological analysis under the Environmental Assessment Act, the Ministry of the Environment has advised that existing well record data and site visits should be relied on to meet the intent of the Act. In the case of Halton, it was recognized that two of the candidate sites have had test drilling programs conducted on them. Therefore it was recommended that a broad scale drilling program be undertaken on the non-drilled sites in order to provide a more comparable level of information for the hydrogeologic interpretation of the candidate sites to provide basic data for conceptual site design. However, the level of detail being considered in Stage 2C is not the level required to carry out implementation of a site.

COMMENT:

We do not believe that this evaluation factor can be considered in isolation from factors #5 and #6 (costs and engineering). Almost any site can be made safe from a public health point of view if enough money and engineering skill is brought to bear. Consequently, we do not see how sites can be fairly evaluated on this basis unless an engineering plan of landfill operation is developed for each candidate site.

Central to this evaluation factor, in our view, is whether or not a leachate collection and disposal system will be necessary and how and at what cost this system will be implemented. Since leachate will be produced for many decades beyond the life of the site this factor likely becomes the overriding public health and safety concern as well as the overriding engineering and cost consideration of any site. Recognition must be given to the fact that state of the art site design at virtually any site includes a leachate collection system and that the disposal of this collected leachate becomes a key consideration in the appropriate location of a new landfill.

In our experience, it is clear that the only cost-effective approach for the disposal of this collected leachate is to dispose of it in the sanitary sewer system. Consequently, access to a sewer main becomes critically important as a location factor. It is not clear that your consultants intend to give substantial weight to this aspect of public health and safety and in our view considerable weight must be given to it at this stage.

STUDY TEAM RESPONSE:

We recognize that leachate collection and treatment are important considerations in the siting of a new landfill. For this reason, the accessibility of the sewage treatment system was considered in Stage 2B and will continue to be so in Stage 2C. It has been determined that the identified candidate sites have access to municipal sewer expansions to warrant their further consideration.

In the Stage 2B Analysis, it was assumed that a leachate collection and disposal system (including connetion to the sanitary sewer system) would be required for each potential site evaluated. This is noted on the assumptions page opposite the capital cost tables between pages 115 to 116.

With respect to an "engineering plan of landfill operation", it is our intention to prepare conceptual plans for landfilling operations for each of the six candidate sites. The conceptual plan is not the very detailed engineering plan that would be required for E.P.A. approval. However, we have been

advised by the Ministry of the Environment that an engineering feasibility level of detail is acceptable for purposes of the Environmental Assessment Act requirements.

COMMENT:

Regarding the agricultural analysis that your consultants intend to carry out, we believe that property ownership or present use of land is substantially less important than is the potential agricultural capability of the land in question. So long as present uses do not preclude the future use of the land for agriculture we believe that it should receive the highest possible ranking based on its capability.

Mere ownership of a property by non-resident owners at a particular point in time does not necessarily mean that its potential for agriculture is diminished. Future agricultural uses are only precluded if non-resident ownership and present use forms the basis for decision making regarding the land in question. Such an approach is shortsighted and encourages speculation in agricultural land by non-residents if such factors are subsequently used as a justification for a development decision.

STUDY TEAM RESPONSE:

A combination of three sub-factors were considered in Stage 2B, as follows:

- soil capability classification;
- degree of fragmentation on parcels;
- local vs. non-local farm-owned parcels.

The sub-factors were treated as having equal weight. The overall ranking for agricultural for Candidate Site E was "moderate" impact. The individual ratings for Site E were "high" under soil capability; "low" for Special Farm Enterprises; and "moderate". In addition, landfilling would be conducted on the basis of progressive rehabilitation so that one cell is rehabilitated as

the next is being landfilled. This means that only a small portion of the site would be out of agricultural crop production at any given period of time, if Agriculture was to be the end-use.

COMMENTS:

It is unclear from your consultants' proposal on this factor whether or not preference would be given to sites which may already be designated in the relevant Official Plan or Zoning By-law as waste disposal sites. It is also unclear whether your consultants intend to shy away from sites which may require approvals under provincial legislation such as the Parkway Belt Planning and Development Act or the Pits and Quarries Control Act.

We do not believe it would be appropriate to give preference to the site at Tremaine and Britannia on the basis that certain approvals under the Planning Act would not be necessary since they have previously been obtained. There are two reasons for this. Firstly, it is clear from a history of the matter that the Official Plan and Zoning By-law designations do not represent any concensus of the local council or of the local community as to what the appropriate use of those lands should be. In the normal situation of a municipality voluntarily designating an area for waste disposal, it may be appropriate to favour a site for that reason as an indication of the appropriateness of the use. We do not believe that that rationale applies where such a designation has been forced through the OMB process.

Secondly, we do not believe that there is a cost or time saving advantage to a site already having certain planning approvals. Under the Consolidated Hearings Act, 1981, it is clear that all approvals for a new site can be combined into one hearing and that that hearing will address the same issues and be just as lengthy and complex whether approvals under the Planning Act are required or not. The same issues will be required to be canvassed to satisfy the requirements of the Environmental Assessment Act. For these two reasons we believe that any existing planning approvals should be ignored for the comparative evaluation of the sites.

The same argument applies regarding the need for additional approvals under other provincial legislation. Where such approvals can be combined into one hearing there is no disadvantage for a site which may require additional approvals.

STUDY TEAM RESPONSE:

Planning proposals/approvals related to landfilling on the candidate sites were not given "preference" or, in fact, any weight in the selection of candidate sites.

COMMENT:

We do not believe that an adequate cost comparison can be made unless an equivalent data base for each site is developed as noted above in our general comments.

STUDY TEAM RESPONSE:

We concur that a consistent data basis is important for a fair cost comparison and such was used in the Stage 2B analysis. In Stage 2C, a site specific analysis will be undertaken for all candidate sites based on a conceptual plan. The level becomes progressively more detailed at each stage in the site selection process.